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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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92-247/

February 8, 1993

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

RE: → MM Docket No. ~~92-245~~ (RM-8026) and
MM Docket No. 92-247 (RM-8098)
St. Croix, Virgin Islands

Dear Ms. Searcy:

St. Croix Wireless Co., Inc. is permittee of WAVI-FM, Christiansted, VI and filed Petitions to Deny in the above referenced rule making proceedings. Although the cycle for reply comments has passed certain statements made by the petitioners are simply false and we feel obligated to correct these statements so that the Commission be able to properly evaluate the merits.

In Docket No. 92-245 (Frederiksted, VI) the petitioner Jose J. Arzuaga attempts to discredit my past actions rather than support his proposal. Arzuaga lists WVGN, Charlotte Amalie, VI as a frequency allotment "authored" by me; in this case Arzuaga lists the station twice (as both Class A and Class B) and neglects to point out this station is on a different island and does not cover St. Croix with a primary (1 mv/m) signal. Likewise, Arzuaga lists WAVI twice with two different frequencies. Other than to upgrade the WAVI facilities, I have not participated in any proposals for St. Croix since I proposed a third local service for Christiansted. What Arzuaga is proposing is a ninth FM service for St. Croix, quite a different matter altogether.

In ¶3 Arzuaga implies his proposal is for a "first service in Frederiksted"; this is false. Frederiksted already has been assigned first service in MM Docket No. 87-327, released November 12, 1992.

In ¶5 Arzuaga confuses operating stations with allotments in disputing the fact that the "majority of St. Croix's currently operating stations are minority owned." The facts are that four stations are minority owned (WSTX-AM, WSTX-FM, WRRR-AM and WVIS-FM); two stations are owned by whites (WJKC-FM and WVIO-FM); and one station is white controlled but has two minority stockholders and board members (WAVI-FM).

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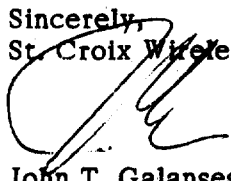
In ¶7 Arzuaga's assertion that St. Croix's economy is "now booming" comes as a surprize to many of us who operate on that island and is an outright contradiction to the newspaper article supplied. Yes, FEMA and insurance companies infused millions which artificially inflated the economy after Hurricane Hugo, but that was three and a half years ago and that money has long since run out. The islands largest resort hotel remains closed leaving hundreds out of work and leaving St. Croix with only about a thousand hotel rooms. The construction of the Hess catalytic cracker plant will be completed by summer and those construction jobs will be lost at that time. Eastern, Pan Am and Braniff Airlines no longer serve the Virgin Islands due to bankruptcies and recently Delta and American severely cut service to and from St. Croix. Finally, Arzuaga must be unaware that casino gambling was defeated in a referendum last November. The opinions of Wireless are shared by Virgin Islands Stereo Communications, licensee of WVIS-FM, Frederiksted. See their comments in MM Docket No. 92-244 where they state the economy of the Virgin Islands cannot support another station.

In his "Summary" Arzuaga once again falsely claims that his proposal would be a "first service" to Frederiksted, ignoring the Commissions earlier action in MM. Docket No. 87-237.

Turning to Docket No. 92-247 (RM-8098) regarding Christiansted, VI, the petitioners reply comments were late filed and should be ignored. The comments received by us related only to the Reply Comments of the Joint Commenters, not to our comments. This leads us to the assumption that either the petitioner did not serve us with the proper document or that he does not disagree with our contention that his petition is without merit and should be denied.

Wireless hopes the correction of facts will enable the Commission to make a fully informed decision in these matters. Sufficient copies of this letter are supplied for inclusion in each of the separate dockets and copies of this letter are being mailed simultaneously to each of the petitioners.

Sincerely,
St. Croix Wireless Co., Inc.



John T. Galanses,
President

cc: Clayton Knight
Jose J. Arzuaga

JTG/at